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April 16, 2007

Standardization Section
Fresh Products Branch
Fruit and Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Room 1661 South Building
Stop 0240
Washington, DC 20250-0240

Regarding: Federal Register Volume 72, No. 60,
Page 14709, March 29, 2007, Proposed
Rule on Grades of Florida Avocados

Our company, Brooks Tropicals, LLC, is the largest grower/packer of Florida avocados. We represent approximately 200 Florida avocado growers.

We understand that Florida avocado grade standards are currently used to grade other types of avocados entering the U.S. We have no problem with this use. However, the Florida avocado standards were developed in 1957 by the Florida avocado industry for use on Florida avocados.

Florida avocados have unique characteristics which differ significantly from varieties such as the Hass avocado.

Therefore, we would be opposed to the proposed name change unless we received assurances that the avocado grade standards would not be changed in the future to favor one type of avocado over another.

Sincerely,

Craig Wheeling
Chief Executive Officer

Premium Quality Tropical Produce Since 1928